

SEWARD & KISSEL LLP

ONE BATTERY PARK PLAZA
NEW YORK, NEW YORK 10004

RITA M. GLAVIN
PARTNER
(212) 574-1309
glavin@sewkis.com

TELEPHONE: (212) 574-1200
FACSIMILE: (212) 480-8421
WWW.SEWKIS.COM

901 K STREET, NW
WASHINGTON, DC 20001
TELEPHONE: (202) 737-8833
FACSIMILE: (202) 737-5184

May 17, 2018

VIA ECF

The Honorable Naomi Reice Buchwald
United States District Judge
Southern District of New York
500 Pearl Street
New York, New York 10007

Re: United States v. Joshua Sosa, 17 Cr. 580 (NRB)

Dear Judge Buchwald:

I represent Joshua Sosa in the above-captioned matter. I write, with the Government's consent, to request another brief extension of time regarding the motion schedule in this matter. This is the defense's second request for an extension on filing motions.

The defense anticipated filing two motions: (1) a motion to compel the production of *Brady* material relating to the identities of two witnesses to the alleged shooting; and (2) a motion to suppress the shooting victim's identification of Mr. Sosa in the hospital on the day of the shooting. As we prepared to file those motions on the original motion date of May 11, the Government provided some additional discovery and engaged in discussions with the defense in an effort to eliminate some or all of the issues regarding those defense motions. Because AUSA Lauren Schorr just finished a trial this week and was unable to speak with us further on those issues until late today, we ask for additional time to file any motions—to Wednesday May 23.

The parties had a discussion today that was productive in narrowing the anticipated *Brady* motion. The parties also exchanged more information and want some time to consider that information in an effort to further narrow the remaining issues, potentially limiting or obviating the need for Court intervention.

Given these developments, and the fact that AUSA Lauren Schorr's trial schedule delayed our motion discussions, we request an extension of the motion schedule, such that the defense would file motions by Wednesday May 23, 2018, the Government opposition to be due on June 25, 2018, and the defense reply due on July 9, 2018.

Hon. Naomi Reice Buchwald

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Respectfully submitted,

/s/

Rita M. Glavin

cc: AUSA Lauren Schorr, Esq. (by email)